

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

In the Matter of L.C.)	
)	
SEBASTIAN CORREA MORALES)	Case No. 1:24-cv-07951
)	
Petitioner,)	[PROPOSED] AMENDED
)	PRETRIAL SCHEDULE
vs.)	
)	
JULIANA ESCOBAR RESTREPO,)	
)	
Respondent.)	
)	

**The Convention on the Civil Aspects of International Child Abduction, done at The Hague
on October 25, 1980; International Child Abduction Remedies Act, 22 U.S.C. 9001 et seq.**

Before the Court is the Verified Petition for the Return of the Child to Colombia (the “Petition”) filed by the Petitioner, Sebastian Correa Morales (the “Petitioner”), against the Respondent, Juliana Escobar Restrepo (the “Respondent”) pursuant to The Hague Convention on the Civil Aspects of International Child Abduction and the International Child Abduction Remedies Act (“ICARA”) [ECF No. 1]. On December 19, 2024, the parties filed a stipulation proposing a joint pretrial schedule [ECF No. 13]. On December 23, 2024, the Court issued an order granting the stipulation with a few modifications. In light of these modifications and the continuance of the trial dates, the parties have conferred and agreed to an Amended Pretrial Schedule. Upon the consent of both parties, as evidenced by the signatures of their respective counsel below, it is hereby:

ORDERED, that the evidentiary hearing currently scheduled for February 5 and 6, 2025 is postponed to and shall now be rescheduled to a date convenient to the Court during the second week of February, excluding February 11, 2025; and it is further

ORDERED, that the parties shall file responses to Motions *in Limine* no later than January 13, 2025; and it is further

ORDERED, that the parties shall exchange Proposed Exhibits, Exhibit Lists and Witness Lists no later than January 20, 2025; and it is further

ORDERED, that the parties shall each file Proposed Exhibit Lists and Witness Lists no later than January 23, 2025; and it is further

ORDERED, that the parties shall each file Proposed Findings of Fact and Conclusions of Law, as well as Pretrial Briefs not to exceed five (5) pages, addressing the legal issues before the Court and outlining their anticipated witness testimony and evidence, by January 31, 2025; and it is further

ORDERED, that the parties shall each submit to the Court hard copies of their Proposed Exhibits on the Friday before trial.

IT IS SO ORDERED.

Dated this ____ day of _____, 2024.

BY THE COURT:

Natasha C. Merle
United States District Judge

SEEN AND APPROVED AS TO FORM AND CONTENT:

By: /s/ Richard Min
Richard Min

By: /s/ Edgar L. Fankbonner
Edgar L. Fankbonner

Michael Banuchis
Green Kaminer Min & Rockmore LLP
420 Lexington Avenue, Suite 2821
New York, New York 10170
Telephone: 212-681-6400
Facsimile: 212-681-6999
Email: rmin@gkmrlaw.com

Attorneys for Petitioner
Sebastian Correa Morales

Attorneys for Respondent
Juliana Escobar Restrepo